

May 8, 2024

Hon. Magistrate Parker
United State District Court, S.D.N.Y.
500 Pearl Street, Courtroom 17D
New York, NY 10007

RE: improper letter submitted by a non-attorney and non-litigant
VIA: electronic submission through *Pro-Se* Intake Unit and to chambers

Your Honor,

I see that Mr. Gavenman, a non-party and non-attorney (***he is not admitted to this case***), shamelessly submitted and filed a letter, addressed to your Honor, in this case, this morning, containing numerous arguments.

Already, in doing such, it is plain to see why this law firm cannot be permitted to enter this case and a firm that does not follow proper procedure.

Plaintiff readily admits she is not an experienced litigator, far from it, but even Plaintiff knows that only attorneys or pro-se parties in a case can submit argument to the Court.

Moreover, having only quickly scanned this emotional letter, it appears Mr. Gavenman is arguing that this is not, in fact, a last minute ‘swap’ of players to enable withholding of documents because documents were produced to Plaintiff last night. This is false. What was produced to Plaintiff, as Plaintiff has noted in a filing to the Court submitted last night to the Pro-Se Intake Unit (Your Honor should receive a copy today or tomorrow, once it is processed) ***contained not a single complaint from 2020 and was essentially a ‘document dump’, 99% of which were publicly available documents from the Jessica Denson case, a 2016 staffer who is suing the Campaign in state court.***

Your Honor ordered all complaints raised, through the 2020 cycle, produced. Yet Defendants thumbed their nose at this Court and instead insisted, stubbornly on producing only documents (almost all of which were already known and publicly available, to boot) from 2016. Mr. Blumetti seemingly figures the heat will not be on him when it is called to the Court’s attention that the production was incomplete (as he would be out of the case by then, by figures) and the new firm is seemingly happy to go along with this (it already has) and to take ***the incredulous position that, in four years and across thousands of employees, not a single woman raised any concerns of gender discrimination, pregnancy discrimination, or sexual harassment, when at least five did, in a single year, in 2016.***

In any event, the letter must be stricken as Mr. Gavenman has no authority to address your Honor and has, in doing so, ***already tainted this process.***

Plaintiff repeats her objection that ***a firm whose founding and current partner faces 11 criminal counts, indicted by the Department of Justice, in an ongoing case, would be against this honorable Court’s duty to uphold the integrity of this case.*** Plaintiff also repeats her concerns that an attorney who represented a third-party witness, twice, and attended both depositions, in which attorney-client privilege was claimed, cannot and should not be permitted to not ‘swap hats.’

Plaintiff also repeats her objection that there is no reason to consider substitution of any counsel, and permit Mr. Blumetti's withdrawal, because Mr. Blumetti and the Defendant-Campaign client never, in fact, demonstrated that any irreparable breakdown occurred. On the contrary, Mr. Blumetti and the Defendant-Campaign continue to happily work together on the Denson case, in NY state court, thus contrasting the self-serving claim, made in this case, that the attorney and client had suffered a breakdown making representation impossible.

The level of misrepresentations to this Court are, in layman's terms, truly 'something to behold' and this Court, Plaintiff pleads, must rein in Defendants' chaotic and improper actions.

Respectfully and humbly submitted,
s/ Arlene Delgado
Plaintiff, pro-se